

# EXHIBIT FOUR

Monday, September 9, 2024 at 22:00:00 Eastern Daylight Time

**Subject:** RE: Mastriano vs. University of New Brunswick, et al., Clyde Ref. No. 10674937/001 - Notice of Representation [CC-US.122674.10674937/001.FID3893716]  
**Date:** Tuesday, July 30, 2024 at 8:48:44 PM Eastern Daylight Time  
**From:** Swallow, Bill  
**To:** Daniel Cox  
**CC:** Passman, Michael, Vanderlaan, Emily, Adams, Christine  
**Attachments:** image007.jpg, image008.gif, image009.png, image010.jpg, image011.gif, image012.png, image013.jpg, image014.gif

Daniel,

Thanks for the email. We are in receipt of your email.

Kind regards,

Bill

**Bill Swallow**  
Partner | Clyde & Co US LLP

**Direct Dial:** +1 312 635 6909 | **Mobile:** +1 312 613 0780  
Chicago | Denver Offices  
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**From:** Daniel Cox <dcox@coxlawcenter.com>  
**Sent:** Tuesday, July 30, 2024 4:35 PM  
**To:** Swallow, Bill <Bill.Swallow@clydeco.us>  
**Cc:** Passman, Michael <Michael.Passman@clydeco.us>; Vanderlaan, Emily <Emily.Vanderlaan@clydeco.us>; Adams, Christine <Christine.Adams@clydeco.us>  
**Subject:** Re: Mastriano vs. University of New Brunswick, et al., Clyde Ref. No. 10674937/001 - Notice of Representation [CC-US.122674.10674937/001.FID3893716]

Counsel:

Please see the attached executed summons to date.

Daniel L. Cox, Esq.  
The Cox Law Center, LLC  
PO Box 545  
Emmitsburg, MD 21727



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*Attorney at Law*  
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**From:** "Swallow, Bill" <[Bill.Swallow@clydeco.us](mailto:Bill.Swallow@clydeco.us)>

**Date:** Wednesday, July 3, 2024 at 4:14 PM

**To:** Daniel Cox <[dcox@coxlawcenter.com](mailto:dcox@coxlawcenter.com)>

**Cc:** "Passman, Michael" <[Michael.Passman@clydeco.us](mailto:Michael.Passman@clydeco.us)>, "Vanderlaan, Emily" <[Emily.Vanderlaan@clydeco.us](mailto:Emily.Vanderlaan@clydeco.us)>, "Adams, Christine" <[Christine.Adams@clydeco.us](mailto:Christine.Adams@clydeco.us)>

**Subject:** Re: Mastriano vs. University of New Brunswick, et al., Clyde Ref. No. 10674937/001 - Notice of Representation [CC-US.122674.10674937/001.FID3893716]

Mr. Cox,

I apologize for not having called yet, but I've been experiencing some travel issues and I am currently traveling with my wife and our four kids. However, I did want to follow-up on my email from last night regarding who we are to represent. I can confirm that our firm represents UNB and its employees. It may make sense to say who we don't represent which would be Mr. Gregory, the National Research Council, and Mr. Kuhn.

If you are available on Friday morning, please let me know a convenient time we can touch base. If you are taking Friday off, Monday can work as well.

Kind regards,

Bill Swallow

**Bill Swallow**  
Partner | Clyde & Co US LLP  
**Direct Dial:** +1 312 635 6909 | **Mobile:** +1 312 613 0780

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**From:** Swallow, Bill

**Sent:** Tuesday, July 2, 2024 9:32:18 PM

**To:** Daniel Cox <[dcox@coxlawcenter.com](mailto:dcox@coxlawcenter.com)>

**Cc:** Passman, Michael <[Michael.Passman@clydeco.us](mailto:Michael.Passman@clydeco.us)>; Vanderlaan, Emily <[Emily.Vanderlaan@clydeco.us](mailto:Emily.Vanderlaan@clydeco.us)>; Adams, Christine <[Christine.Adams@clydeco.us](mailto:Christine.Adams@clydeco.us)>

**Subject:** RE: Mastriano vs. University of New Brunswick, et al., Clyde Ref. No. 10674937/001 - Notice of

Representation [CC-US.122674.10674937/001.FID3893716]

Mr. Cox,

Thank you kindly for your correspondence below and the corresponding deadline to respond.

We have confirmed with our client, the University of New Brunswick, that we will not be waiving service in this issue as they reside in a foreign country. At this time, we are waiting confirm but anticipate that we will be representing many, if not most, of the professors from UNB, but hope to have that confirmation for you tomorrow.

I will still call you tomorrow to discuss the matter but wanted to make sure to meet your email request.

Should you have any additional questions, please let us know.

Kind regards,

Bill

**Bill Swallow**  
Partner | Clyde & Co US LLP

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**From:** Daniel Cox <[dcox@coxlawcenter.com](mailto:dcox@coxlawcenter.com)>

**Sent:** Tuesday, July 2, 2024 7:47 PM

**To:** Swallow, Bill <[Bill.Swallow@clydeco.us](mailto:Bill.Swallow@clydeco.us)>

**Cc:** Passman, Michael <[Michael.Passman@clydeco.us](mailto:Michael.Passman@clydeco.us)>; Vanderlaan, Emily <[Emily.Vanderlaan@clydeco.us](mailto:Emily.Vanderlaan@clydeco.us)>; Adams, Christine <[Christine.Adams@clydeco.us](mailto:Christine.Adams@clydeco.us)>

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Mr. Swallow:

I trust you are well. We have waited on your response to agree to a Rule 4 waiver of service of process for the last two weeks, thus my follow up call and email yesterday. However, there has been a failure to respond.

As such, we intend to seek the costs of service of process. Your e-mail below indicated a timely response and I look forward to hearing back from you **by noon tomorrow July 3, 2024** or we will be required to proceed with serving this matter and seeking reimbursement from you client for the same. You have asked that we not contact UNB but the federal rules of procedure will mandate personal service of process through our international process server without your timely response.

Additionally, please indicate whether the UNB has hired you to represent the named professors in the complaint.

Please do not hesitate to call me back. I look forward to hearing from you.

Thank you,

Daniel L. Cox, Esq.  
The Cox Law Center, LLC  
PO Box 545  
Emmitsburg, MD 21727



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*Attorney at Law*  
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**From:** "Swallow, Bill" <[Bill.Swallow@clydeco.us](mailto:Bill.Swallow@clydeco.us)>  
**Date:** Friday, June 14, 2024 at 6:08 PM  
**To:** Daniel Cox <[dcox@coxlawcenter.com](mailto:dcox@coxlawcenter.com)>  
**Cc:** "Passman, Michael" <[Michael.Passman@clydeco.us](mailto:Michael.Passman@clydeco.us)>, "Vanderlaan, Emily" <[Emily.Vanderlaan@clydeco.us](mailto:Emily.Vanderlaan@clydeco.us)>, "Adams, Christine" <[Christine.Adams@clydeco.us](mailto:Christine.Adams@clydeco.us)>  
**Subject:** Mastriano vs. University of New Brunswick, et al., Clyde Ref. No. 10674937/001 - Notice of Representation [CC-US.122674.10674937/001.FID3893716]

Mr. Cox,

We trust that this email finds you well.

We write to advise you that we've been retained by the University of New Brunswick ("UNB") in relation to the claim you have filed in the United States District Court for the Western District of Oklahoma, entitled *Mastriano v. Gregory, et al*, Case 5:24-cv-00567. We are in receipt of your June 3, 2024, email wherein you requested that the UNB waiver service under Rule 4. We are discussing this request with our client and will advise you of their decision shortly. However, please accept this email as notice of our representation, and only our notice of representation, and we would ask that you direct all communication related to this matter to our attention.

Should you have any questions or wish to discuss the above, please let us know.

Kind regards,

Bill Swallow

**Bill Swallow**  
Partner | Clyde & Co US LLP

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